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May 22, 2018

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By Email Attachment

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: May 23, 2018

Re: U.S.A v. Ahuja, et al., 18 Cr. 328 (KPF): Extension of Time to Move for a Bill of Particulars

Dear Judge Failla:

We write on behalf of Defendant Jeremy Shor to respectfully request an extension of time to move for a bill of particulars in the above-captioned matter. Mr. Shor's co-defendants, Anilesh Ahuja and Amin Majidi, join in this request.

Rule 7(f) of the Federal Rules of Criminal Procedure provides that a defendant "may move for a bill of particulars before or within 14 days after arraignment or at a later time if the court permits." Fed. R. Crim. P. 7(f). Because Defendants were arraigned on May 11, 2018, Defendants would be required to move for a bill of particulars by May 25, 2018, unless the Court permits otherwise. At the initial pretrial conference, Your Honor stated that a schedule for filing pretrial motions would be discussed at the next conference. Though we interpret Your Honor's statement to include any potential motion for a bill of particulars, in an abundance of caution, we are submitting this letter to request clarification that the date by which Defendants must file such a motion has been extended or, alternatively, to request an extension of time to file a bill of particulars to the date by which all other pretrial motions must be filed. We have reached out to the Government, and AUSA Joshua Naftalis has consented to our request.

Respectfully submitted,



Daniel S. Ruzumna

Cc.: Counsel of Record

The Court is in receipt of the above letter and writes to confirm that any deadline for filing a motion for a bill of particulars would be subsumed by the Court's forthcoming motions scheduling order.

Dated: May 23, 2018
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE